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DOC #:

DATE FILED: 09/15/2023

VIA ECF

The Honorable Analisa Torres, U.S.D.J.
U.S. District Court, Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Holguin et al v. Quality Furniture NY LLC et al*
Case No.: 1:23-cv-00004-AT

Dear Honorable Judge Torres:

This law firm represents Plaintiffs Camilo Holguin and Astrid Coello (together, the "Plaintiffs") in the above-referenced matter.

Pursuant to Your Honor's Individual Motion Practice Rule I(C), this letter respectfully serves to request an extension of time to file Plaintiffs' Motion for Default Judgement from September 14, 2023, to, through and including, October 31, 2023.

The basis of this request is that Plaintiff Tomaz Laskawski ("Mr. Laskawski") has recently decided to opt-in to the instant action. Additional time is needed to gather additional information from Mr. Laskawski, in support of an anticipated Motion for Default Judgment.

A second, independent basis also necessitates the instant request. The undersigned law firm has had limited availability during the month of September 2023 due in light of the Jewish high holidays of Rosh HaShana and Yom Kippur.

Plaintiffs' counsel anticipates being in a position to finalize and file the Motion for Default Judgment on or before October 31, 2023.


Thank you, in advance, for your time and attention to this matter.

GRANTED. By **October 31, 2023**, Plaintiffs may file a motion for default judgment. Should Defendants appear on or before that date, Plaintiffs shall so advise the Court via letter.

The complaint does not include allegations related to Mr. Laskawski's claims. For default judgment to be granted in his favor, Defendants must have notice of the "content or scope" of Mr. Laskawski's claim. *Alonso v. New Day Top Trading, Inc.*, No. 18 Civ. 4745, 2021 WL 4691320, at *5 (S.D.N.Y. Oct. 7, 2021). Prior to filing a motion for default judgment on behalf of Mr. Laskawski, Plaintiffs are directed to serve upon Defendants a notice of consent to sue form that includes factual allegations of the content and scope of Mr. Laskawski's claims and file proof of service on the docket. Plaintiffs may also seek leave to file an amended complaint to incorporate Mr. Laskawski's claims. *See Suriel v. Cruz*, No. 20 Civ. 8442, 2022 WL 1750232, at *7 (S.D.N.Y. Jan. 10, 2022).

SO ORDERED.

Dated: September 15, 2023
New York, New York



ANALISA TORRES
United States District Judge